

6/16/09 Bd Mtg

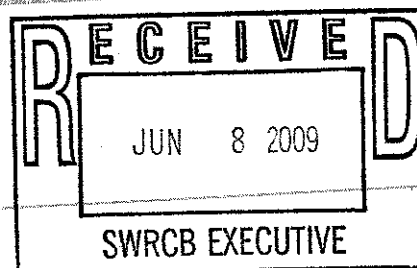
Item 8

ARRA

Deadline: 6/10/09 by 12 noon

commentletters - Comment letter - ARRA subsidy

From: "John K. Green" <johng@pacificwatershed.com>
To: <commentletters@waterboards.ca.gov>
Date: Monday, June 08, 2009 10:59 AM
Subject: Comment letter - ARRA subsidy



To whom it may concern:

I am writing to comment on the draft State Water Board resolution to be considered at the June 16, 2009 board meeting. I applaud your recommendation that 15% of the ARRA subsidy funding be split between disadvantaged community (DAC) wastewater treatment projects and new expanded use projects. Both categories are very worthy of ARRA subsidies, and I believe both will result in fewer job losses and the creation of new employment as specified in the ARRA.

However, I have some concerns about the criteria for funding of expanded use projects. Specifically, I am concerned and somewhat confused by the recommendation on Issue 2: that all expanded use funding be directed exclusively toward urban stormwater projects. The staff report on the draft resolution states: "Urban stormwater projects have not received as much grant funding through the State Water Board NPS solicitations as other categories of NPS." The staff report goes on to recommend the adoption of Option 2C, prioritizing funding for urban stormwater projects serving DACs. The report states, "This approach will help balance out the substantial amount of State Water Board funding already awarded to forestry projects, as well as provide subsidy funds to applicants that historically have had difficulty accessing CWSRF funds." However, the table provided in the staff report listing types of expanded use projects, amount of funding requested in CWSRF expanded use applications for each project type, and amount of grant funding awarded since 2000 for each project type (Table 1) clearly shows that far more funding has gone to urban stormwater projects since 2000 than to forestry projects - some \$42 million to urban stormwater projects compared to \$30 million to forestry projects. This table, if accurate, clearly contradicts the stated rationale for excluding forestry projects from consideration for funding, and the adoption of Option 2C will only exacerbate a funding imbalance that has disadvantaged forestry projects since 2000. Why is this?

I am troubled by the recommendation to exclude forestry projects from consideration for ARRA funding. I work for a consulting firm that historically has performed substantial amounts of grant-funded work (both with the State Water Board and from other funding sources). This work has been overwhelming geared toward the improvement of water quality and aquatic habitat in rural areas, employing people in disadvantaged communities in improving their own water. Our industry has been hit particularly hard by reductions in the amount of available funding and the freeze on state bond-funded projects, in addition to the decrease in work that is associated with the general decline in economic conditions. Many agencies and firms have had multiple layoffs, and some firms have gone bankrupt. The freeze on state bond funding has had multiple deleterious effects, with many invoices going unpaid (some for nearly a year now), we have not been able to, in turn, pay our (mostly rural) contractors, and they have in turn been negatively affected. Some contractors are now unwilling to work on grant-funded projects, because they have no assurance that they will be paid for their work at all, much less in a timely manner. Huge amounts of knowledge and experience are being lost through this process. The allocation of expanded use funding toward forestry projects would help to offset these effects.

In addition, forestry-type expanded use projects are meritorious in their own right. Many serve disadvantaged communities, and they provide employment for people living in those communities. Additionally, they provide very cost-effective improvements to water quality in streams and watersheds that not only serve as vital fish habitat, but also almost always provide drinking water for many of these same disadvantaged communities. Many of these communities have not identified stormwater issues as a problem for their water bodies, and so through the adoption of Option 2C they will continue to be disadvantaged in terms of both funding and employment.

I urge you to, at the very least, correct your explanation for the adoption of Option 2C. Furthermore, I believe it is unwise to exclude forestry projects from eligibility for ARRA funding for the reasons I outlined above, and I urge you to reconsider this recommendation.

Thank you,

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